

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	: CRIMINAL NO. 21-
v.	: DATE FILED:
JOSHUA MORALES	: VIOLATION:
	18 U.S.C. § 924(a)(1)(A) (false
	: statement to a federal firearms dealer
	- 7 counts)
	: Notice of forfeiture

INDICTMENT

COUNTS ONE THROUGH SEVEN

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. Tanner's Sports Center Inc., located at 2301 York Road, Jamison, Pennsylvania, possessed a federal firearms license and was authorized to deal in firearms under federal laws.

2. Delaware Valley Sports Center, Inc., located at 101 Geiger Road, Philadelphia, Pennsylvania, possessed a federal firearms license and was authorized to deal in firearms under federal laws.

3. The Bunker Gun Shop, located at 549 York Road, Warminster, Pennsylvania, possessed a federal firearms license and was authorized to deal in firearms under federal laws.

4. Mad Minute Enterprise, LLC, "Delia's Gun Shop", located at 6104 Torresdale Avenue Philadelphia, Pennsylvania, possessed a federal firearms license and was authorized to deal in firearms under federal laws.

5. Federal firearms license (“FFL”) holders are licensed, among other things, to sell firearms and ammunition. Various rules and regulations, promulgated under the authority of Chapter 44, Title 18, United States Code, govern the manner in which FFL holders are permitted to sell firearms and ammunition.

6. The rules governing FFL holders require that a person seeking to purchase a firearm fill out a Firearm Transaction Record, ATF Form 4473. Part of the Form 4473 requires that the prospective purchaser certify that all of his or her answers on Form 4473 are true and correct. Question 11(a) of Form 4473 requires that the prospective purchaser answer whether he or she is the actual transferee/buyer of the firearm. The Form 4473 contains language warning that “You are not the actual buyer if you are acquiring the firearm(s) on behalf of another person. If you are not the actual buyer, the dealer cannot transfer the firearm(s) to you.” The Form 4473 also contains language warning that all information provided must be certified as “true, correct, complete,” and that providing false information in response to Question 11(a) is a “crime punishable as a felony under federal law.”

7. FFL holders are required to maintain a record, in the form of a completed Form 4473, of the identity of the actual buyer of firearms sold by the FFL holder, including the buyer’s home address and date of birth.

8. On or about the dates listed below, in the Eastern District of Pennsylvania, defendant

JOSHUA MORALES,

in connection with the acquisition of each of the firearms listed below from the FFL holders listed below, knowingly made a false statement and representation with respect to information required by the provisions of Title 18, United States Code, to be kept in the FFL holder’s

records, in that the defendant MORALES certified on the Form 4473 that he was the actual transferee/buyer of the firearms listed below, when in fact, as defendant knew, this statement was false and fictitious.

Count	Date	FFL	Firearm(s)	Serial Number
One	February 21, 2020	Tanner's Sports Center Inc.	A Springfield, Model XD Mod 2, .40 caliber S&W semi-automatic pistol	GM164094
Two	July 30, 2020	Tanner's Sports Center Inc.	A FN, Model FiveSeven, 5.7x28mm, semi-automatic pistol; A Taurus, Model 856, .38 caliber revolver; A Glock, Model 17, 9mm semi-automatic pistol; and A Sig Sauer, Model MCX, 300 Blackout semi-automatic pistol	386391526 ABE624729 BPGW814 63F033246
Three	August 7, 2020	Delaware Valley Sports Center, Inc.	A Canik, Model TP9SF Elite, 9mm semi-automatic pistol; and A CZ, Model 75 SP-01, 9mm semi-automatic pistol	20BH14323 D075291
Four	August 21, 2020	Mad Minute Enterprise, LLC, "Delia's Gun Shop"	A SDS Imports, Model 1911 A1, .45 ACP semi-automatic pistol	T0620-20Z11313
Five	September 8, 2020	The Bunker Gun Shop	A Glock, Model 17, 9mm semi-automatic pistol; and A Glock, Model 36, .45 semi-automatic pistol,	BPVL934 BGHU763
Six	September 8, 2020	Tanner's Sports Center Inc.	A Taurus, Model G2C, 9mm semi-automatic pistol; and A Taurus, Model G2C, 9mm semi-automatic pistol	ABJ874729 ABH801953
Seven	September 16, 2020	Tanner's Sports Center Inc.	A Taurus, Model G2C, 9mm semi-automatic pistol; A Taurus, Model G2C, 9mm semi-automatic	ABH795351 ABH801856

			pistol; A Taurus, Model G2C, 9mm semi-automatic pistol;	ABH801762
			A SCCY, Model CPX-2, 9mm semi-automatic pistol;	C006801
			A FN, Model FiveSeven, 9mm semi-automatic pistol;	386395940
			A Glock, Model 23c, .40 caliber semi-automatic pistol;	ABRW532
			A Glock, Model 17, 9mm semi-automatic pistol;	BRAB121
			A Glock, Model 19, 9mm semi-automatic pistol AENA015;	AENA015
			A Smith & Wesson, Model M&P 40 Shield, .40 caliber semi- automatic pistol;	LEV8821
			A Ruger, Model LCP, 308 ACP semi-automatic pistol; and	372376740
			A Springfield, Model XDS, .45 caliber ACP semi-automatic pistol	BY321772

All in violation of Title 18, United States Code, Section 924(a)(1)(A).

NOTICE OF FORFEITURE**THE GRAND JURY FURTHER CHARGES THAT:**

As a result of the violations of Title 18, United States Code, Section 924(a)(1)(A),
set forth in this indictment, defendant

JOSHUA MORALES

shall forfeit to the United States of America the firearms involved in the commission of such
offenses, including, but not limited to:

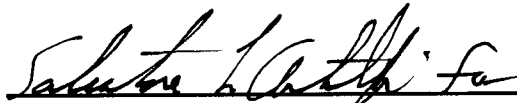
Firearm	Serial Number
A Springfield, Model XD Mod 2, .40 caliber S&W semi-automatic pistol	GM164094
A FN, Model FiveSeven, 5.7x28mm, semi-automatic pistol	386391526
A Taurus, Model 856, .38 caliber revolver	ABE624729
A Glock, Model 17, 9mm semi-automatic pistol	BPGW814
A Sig Sauer, Model MCX, 300 Blackout semi-automatic pistol	63F033246
A Canik, Model TP9SF Elite, 9mm semi-automatic pistol	20BH14323
A CZ, Model 75 SP-01, 9mm semi-automatic pistol	D075291
A SDS Imports, Model 1911 A1, .45 ACP semi-automatic pistol	T0620- 20Z11313
A Glock, Model 17, 9mm semi-automatic pistol	BPVL934
A Glock, Model 36, .45 semi-automatic pistol	BGHU763
A Taurus, Model G2C, 9mm semi-automatic pistol	ABJ874729
A Taurus, Model G2C, 9mm semi-automatic pistol	ABH801953
A Taurus, Model G2C, 9mm semi-automatic pistol	ABH795351
A Taurus, Model G2C, 9mm semi-automatic pistol	ABH801856
A Taurus, Model G2C, 9mm semi-automatic pistol	ABH801762
A SCCY, Model CPX-2, 9mm semi-automatic pistol	C006801
A FN, Model FiveSeven, 9mm semi-automatic pistol	386395940
A Glock, Model 23c, .40 caliber semi-automatic pistol	ABRW532
A Glock, Model 17, 9mm semi-automatic pistol	BRAB121
A Glock, Model 19, 9mm semi-automatic pistol	AENA015
A Smith & Wesson, Model M&P 40 Shield, .40 caliber semi-automatic pistol	LEV8821
A Ruger, Model LCP, 308 ACP caliber semi-automatic pistol	372376740
A Springfield, Model XDS .45 caliber ACP semi-automatic pistol	BY321772

All pursuant to Title 18, United States Code, Section 924(d), made applicable by
Title 28, United States Code, Section 2461(c).

A TRUE BILL:



GRAND JURY FOREPERSON



**JENNIFER ARBITTIER WILLIAMS
ACTING UNITED STATES ATTORNEY**

No. _____

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania

Criminal Division

THE UNITED STATES OF AMERICA

vs.

JOSHUA MORALES

INDICTMENT

Counts

18 U.S.C. § 924(a)(1)(A) (false statement to a federal firearms dealer – 7 counts); Notice of forfeiture



Filed in open court this _____ day,
Of _____ A.D. 20 _____

Clerk

Bail, \$ _____